

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

WASHINGTON MUTUAL BANK,  
  
Plaintiff,  
  
v.  
  
DAN W. ADAMS, HEIDI K. ADAMS,  
UNITED STATES OF AMERICA,  
COMMONWEALTH OF  
MASSACHUSETTS DEPARTMENT OF  
REVENUE, DELTA FUNDING  
CORPORATION and BENEFICIAL  
MASSACHUSETTS INC.,  
  
Defendants.

## REQUEST FOR DEFAULT

I, Mary Ellen Manganello, attorney for the above-named plaintiff, Washington Mutual Bank, (“Washington Mutual”), pursuant to Fed. R. Civ. P. 55, state that the Complaint in which a judgment for affirmative relief is sought against the defendant, Delta Funding Corporation, herein, was filed on August 15, 2005. The summons and a copy of the complaint was served on Delta Funding Corporation on August 19, 2005, as appears from the officer’s return filed with this court. The time within which the Delta Funding Corporation was granted to serve a responsive pleading, or otherwise defend, has expired and Delta Funding Corporation herein has failed to serve or file an answer or otherwise defend the Complaint.

WHEREFORE, Plaintiff makes application that Delta Funding Corporation be defaulted.

Respectfully Submitted,

WASHINGTON MUTUAL BANK,  
By its attorneys,

/s/ Mary Ellen Manganelli  
Donn A. Randall (BBO #631590)  
J. Patrick Kennedy (BBO #565778)  
Mary Ellen Manganelli (BBO #641658)  
Bulkley, Richardson and Gelinas, LLP  
One Post Office Square, Suite 3700  
Boston, MA 02109  
Tel: 617-368-2500  
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Dated: September 9, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the defendant, Delta Funding Corporation by mail on September 9, 2005.

/s/ Mary Ellen Manganelli  
Mary Ellen Manganelli